

BellSouth Corporation
Legal Department
Suite 900
1133-21st Street, NW
Washington, DC 20036-3351

jonathan.banks@bellsouth.com

Jonathan Banks
General Attorney

202 463 4182
Fax 202 463 4195

EX PARTE OR LATE FILED

October 9, 2001

WRITTEN EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED

OCT - 9 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

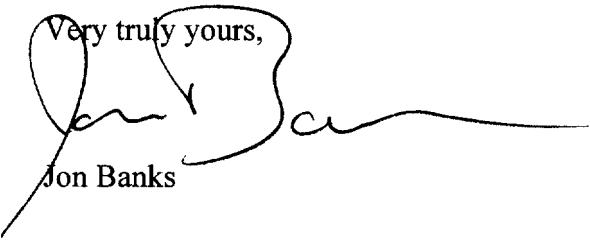
Re: CC Docket No. 01-277

Dear Ms. Salas:

The attached letter addressed to Cynthia Lewis of the Department of Justice responds to a request for additional information concerning the time it takes BellSouth to notify CLECs of the completion of coordinated customer conversations (Hot Cuts) and the amount of time it takes CLECs to accept conversions.

In accordance with Section 1.1206, I am filing two copies of this notice and the attachment and request that you place them in the record of the proceeding identified above. The 20-page limit does not apply as set forth in DA 01-2286.

Very truly yours,


Jon Banks

Attachment

cc: Luinn Fitch
Jessica Rosenworcel
Susan Pié
James Davis-Smith
Cynthia Lewis

No. of Copies rec'd 0+2
List ABCDE

BellSouth Corporation
Legal Department
Suite 900
1133-21st Street, NW
Washington, DC 20036-3351

jonathan.banks@bellsouth.com

Jonathan Banks
General Attorney

202 463 4182
Fax 202 463 4195

EX PARTE OR LATE FILED

October 9, 2001

RECEIVED

OCT - 9 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Cynthia Lewis
U.S. Department of Justice
Antitrust Division
1401 H Street, N.W.
Suite 8000
Washington, D.C. 20005

Re: Joint Application by BellSouth Corporation, et al. for Provision
of In-Region, InterLATA Services in Georgia and Louisiana,
CC Docket 01-277

Dear Ms. Lewis:

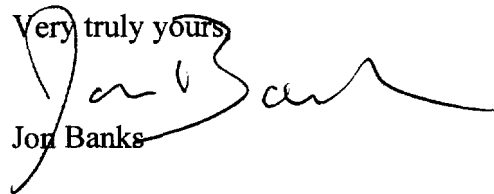
In response to your request, here is some additional information concerning the time it takes BellSouth to notify CLECs of the completion of coordinated customer conversions (Hot Cuts) and the amount of time it takes CLECs to accept conversions. The information is broken out separately for BellSouth's region, Georgia and Louisiana, and includes the time period from May through July.

As you know, BellSouth's hot cut duration measures set by the Georgia and Louisiana Commissions do not exclude IDLC loops, and thus set particularly aggressive targets. Those Commissions have set duration measures that do not include time to notify CLECs. As the additional data provided with this letter show, BellSouth meets these duration targets consistently, even if the time to notify CLECs is included.

No. of Copies rec'd 012
List ABCDE

Ms. Cynthia Lewis
October 9, 2001
Page Two

Pursuant to the Federal Communication Commission's filing requirements and in accordance with 47 C.F.R. § 1.1206, we are submitting two copies of this cover letter and ex parte in paper and electronic form, to Ms. Magalie Roman Salas, Secretary, Federal Communications Commission, Room TW-B-204, 445 12th Street, S.W., Washington, D.C. 20554

Very truly yours,

Jon Banks

Enclosures
cc: Jessica Rosenworcel
Susan Pié
James Davis-Smith

Notification and Acceptance Summary Region

Notification

Average time from Cut Completion to CLEC Notification on all orders (HRS:MIN:SEC)

	May	June	July
Orders where CLEC was Notified of Cut Complete	4,919	3,810	2,903
Average amount of Notification Time	0:02:41	0:03:06	0:02:25

Average time from Cut Completion to CLEC Notification if
Notification took more than **5 Min.** (HRS:MIN:SEC)

	May	June	July
Orders where CLEC was Notified of Cut Complete	313	218	137
Average amount of Notification Time	0:20:52	0:30:53	0:23:16
Percent of Total Orders shown above	6.4%	5.7%	4.7%

Average time from Cut Completion to CLEC Notification if
Notification took more than **15 Min.** (HRS:MIN:SEC)

	May	June	July
Orders where CLEC was Notified of Cut Complete	88	57	35
Average amount of Notification Time	0:50:58	1:32:46	1:03:44
Percent of Total Orders shown above	1.8%	1.5%	1.2%

Acceptance

Average time from CLEC Notification to CLEC Acceptance (HRS:MIN:SEC)

	May	June	July
Orders where CLEC gave verbal Acceptance	4,281	3,358	2,639
Average amount of ACCEPTANCE TIME	3:15:09	3:06:00	3:08:47

Average time from CLEC Notification to CLEC Acceptance if
took more than 30 Min. (HRS:MIN:SEC)

	May	June	July
Orders where CLEC gave verbal Acceptance	2,803	1,974	1,642
Average amount of ACCEPTANCE TIME	4:51:30	5:07:13	4:54:57
Percent of Total Orders shown above	65.5%	58.8%	62.2%

Average time from CLEC Notification to CLEC Acceptance if
took more than 2 Hrs. (HRS:MIN:SEC)

	May	June	July
Orders where CLEC gave verbal Acceptance	1,647	1,109	837
Average amount of ACCEPTANCE TIME	7:28:53	8:16:00	8:35:10
Percent of Total Orders shown above	38.5%	33.0%	31.7%

Average Duration Measurement

% Orders Completed within 15 Minutes/Circuit

	May	June	July
Current Definition (Start of Cut to Completion of Cut)	99.5%	99.4%	99.6%
Revised Definition (Start of Cut to Notification of CLEC)	97.9%	98.1%	98.1%
Revised Definition (Start to Notify with 5 Extra Minutes allowed)	98.6%	98.6%	98.8%

Circuits per Hot Cut

	May	June	July
Average Number of Loops per Coordinated Hot Cut	2.9	3.1	3.3

Notification and Acceptance Summary Georgia

Notification

Average time from Cut Completion to CLEC Notification on all orders (HRS:MIN:SEC)

	May	June	July
Orders where CLEC was Notified of Cut Complete	904	828	608
Average amount of Notification Time	0:04:47	0:06:57	0:04:31

Average time from Cut Completion to CLEC Notification if
Notification took more than **5 Min.** (HRS:MIN:SEC)

	May	June	July
Orders where CLEC was Notified of Cut Complete	128	96	53
Average amount of Notification Time	0:23:17	0:47:08	0:34:38
Percent of Total Orders shown above	14.2%	11.6%	8.7%

Average time from Cut Completion to CLEC Notification if
Notification took more than **15 Min.** (HRS:MIN:SEC)

	May	June	July
Orders where CLEC was Notified of Cut Complete	48	27	14
Average amount of Notification Time	0:45:57	2:25:11	1:43:04
Percent of Total Orders shown above	5.3%	3.3%	2.3%

Acceptance

Average time from CLEC Notification to CLEC Acceptance (HRS:MIN:SEC)

	May	June	July
Orders where CLEC gave verbal Acceptance	810	760	569
Average amount of ACCEPTANCE TIME	5:53:37	3:28:11	1:59:43

Average time from CLEC Notification to CLEC Acceptance if
took more than 30 Min. (HRS:MIN:SEC)

	May	June	July
Orders where CLEC gave verbal Acceptance	432	307	233
Average amount of ACCEPTANCE TIME	10:52:35	8:17:11	4:33:21
Percent of Total Orders shown above	53.3%	40.4%	40.9%

Average time from CLEC Notification to CLEC Acceptance if
took more than 2 Hrs. (HRS:MIN:SEC)

	May	June	July
Orders where CLEC gave verbal Acceptance	288	166	118
Average amount of ACCEPTANCE TIME	15:49:07	14:27:39	8:01:56
Percent of Total Orders shown above	35.6%	21.8%	20.7%

Average Duration Measurement

% Orders Completed within 15 Minutes/Circuit

	May	June	July
Current Definition (Start of Cut to Completion of Cut)	99.6%	99.4%	99.8%
Revised Definition (Start of Cut to Notification of CLEC)	94.8%	97.2%	97.7%
Revised Definition (Start to Notify with 5 Extra Minutes allowed)	96.6%	97.8%	98.4%

Circuits per Hot Cut

	May	June	July
Average Number of Loops per Coordinated Hot Cut	2.8	3.0	2.9

Notification and Acceptance Summary Louisiana

Notification

Average time from Cut Completion to CLEC Notification on all orders (HRS:MIN:SEC)

	May	June	July
Orders where CLEC was Notified of Cut Complete	167	143	150
Average amount of Notification Time	0:02:41	0:02:52	0:02:45

Average time from Cut Completion to CLEC Notification if
Notification took more than **5 Min.** (HRS:MIN:SEC)

	May	June	July
Orders where CLEC was Notified of Cut Complete	10	9	12
Average amount of Notification Time	0:19:21	0:17:58	0:12:00
Percent of Total Orders shown above	6.0%	6.3%	8.0%

Average time from Cut Completion to CLEC Notification if
Notification took more than **15 Min.** (HRS:MIN:SEC)

	May	June	July
Orders where CLEC was Notified of Cut Complete	6	4	2
Average amount of Notification Time	0:27:34	0:29:58	0:19:59
Percent of Total Orders shown above	3.6%	2.8%	1.3%

Acceptance

Average time from CLEC Notification to CLEC Acceptance (HRS:MIN:SEC)

	May	June	July
Orders where CLEC gave verbal Acceptance	153	129	137
Average amount of ACCEPTANCE TIME	1:44:24	2:12:58	2:23:04

Average time from CLEC Notification to CLEC Acceptance if
took more than 30 Min. (HRS:MIN:SEC)

	May	June	July
Orders where CLEC gave verbal Acceptance	101	74	96
Average amount of ACCEPTANCE TIME	2:29:53	3:40:39	3:16:27
Percent of Total Orders shown above	66.0%	57.4%	70.1%

Average time from CLEC Notification to CLEC Acceptance if
took more than 2 Hrs. (HRS:MIN:SEC)

	May	June	July
Orders where CLEC gave verbal Acceptance	38	21	39
Average amount of ACCEPTANCE TIME	5:02:24	10:14:44	6:36:45
Percent of Total Orders shown above	24.8%	16.3%	28.5%

Average Duration Measurement

% Orders Completed within 15 Minutes/Circuit

	May	June	July
Current Definition (Start of Cut to Completion of Cut)	100.0%	100.0%	100.0%
Revised Definition (Start of Cut to Notification of CLEC)	97.0%	96.5%	96.7%
Revised Definition (Start to Notify with 5 Extra Minutes allowed)	98.2%	97.9%	98.7%

Circuits per Hot Cut

	May	June	July
Average Number of Loops per Coordinated Hot Cut	2.9	3.1	3.2